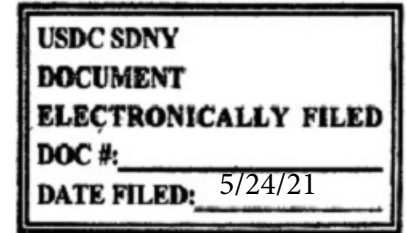


Paul A. Sanders  
Partner



May 14, 2021

**VIA CM/ECF**

Hon. Barbara Moses  
United States Magistrate Judge  
Southern District of New York  
500 Pearl St., Room 740  
New York, New York 10007

**MEMO ENDORSED**

Re: Michelo, et al. v. National Collegiate Student Loan Trust 2007-2, et al.  
Civil No: 1:18-cv-01781  
Bifulco, et al. v. National Collegiate Student Loan Trust 2006-4, et al.  
Civil No: 1:18-cv-07692

Dear Judge Moses:

We represent non-party Affiant X. Pursuant to Your Honor's Individual Practice No. 3, Affiant X writes to request permission to file a Corrected Declaration of Affiant X, in order to remedy some inaccuracies in the original motion, under seal, in connection with the previously-submitted Motion for a Protective Order (*Dkt.* 266 in civil no. 1:18-cv-01781; and *Dkt.* 196 in civil no. 1:18-cv-07692).

Affiant X seeks to file this Corrected Declaration of Affiant X under seal given the references therein to Affiant X's private health information, which is confidential under the parties' Protective Order.

Paragraph 2 of the parties' Protective Order sets forth what may be designated as confidential. *See Dkt.* 92, ¶ 2. Specifically, paragraph 2(d) contemplates: "personal information including, but not limited to . . . medical information . . . other information that individuals would not normally reveal, and any information that a Producing Party believes in good faith to be subject to data protection laws or other privacy obligations."

Pursuant to Your Honor's Individual Practices, this Corrected Declaration is being contemporaneously filed under seal in the CM/ECF system, electronically related to the instant letter motion, and will be provided to counsel of record in unsealed format designated as confidential.

Hon. Barbara Moses  
May 14, 2021  
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Thank you for Your Honor's consideration of this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Paul Sanders", with a checkmark at the end.

Paul A. Sanders

PAS: jet

cc: All counsel of record (via CM/ECF)

Application GRANTED IN PART. For the reasons stated in the Court's Order dated April 27, 2021 (Dkt. No. 281 in Case No. 18-cv-1781 and Dkt. No. 211 in Case No. 18-cv-7692), non-party Affiant X is directed to promptly file a redacted version of the Corrected Declaration of Affiant X (Dkt. No. 301 in Case No. 18-cv-1781 and Dkt. No. 229 in Case No. 18-cv-7692) on the public docket in both actions. As set forth in the April 27 Order, Affiant X may redact his name and other personally identifying information from the publicly-filed copy of his Corrected Declaration. By granting this sealing application in part, the Court expresses no view as to the propriety or admissibility of the Corrected Declaration. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Barbara Moses".

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Barbara Moses  
United States Magistrate Judge  
May 24, 2021